National Environmental Achievement Track

Application Form

U. S. Department of Energy Kansas City Plant
Managed and Operated by Honeywell Federal Manufacturing & Technologies[1]

Name of facility

Honeywell Federal Manufacturing & Technologies is a business unit of Honeywell International Inc.

Name of parent company (if any)

2000 E. 95th Street

Street address

P.O. Box 410202

Street address (continued)

Kansas City, MO 64141-0202

City/State/Zip code

[1]Operated for the U.S. Department of Energy under contract number DE-AC04-76-DP00614

Give us information about your contact person for the National Environmental Achievement Track Program.

Name David M. Caughey, U.S. Department of Energy, Kansas City Plant

Title Acting Assistant Area Manager, Office of Safety and Security

Phone (816) 997-3449

Fax (816) 997-7310

E-mail dcaughey@kcp.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

The U.S. Department of Energy's Kansas City Plant (KCP) manufactures non-nuclear electrical and mechanical components for national defense. The KCP is managed and operated by Honeywell Federal Manufacturing & Technologies (FM&T).

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
9711 3672 3471 3086

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes ☐ No

MO9890010524

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right ***or*** enclose a completed Checklist with your application.

See attached checklist.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Significant efforts through our Pollution Prevention Program have allowed the Kansas City Plant (KCP) to reduce the generation of hazardous waste by 203 tons and sanitary wastes by 5,737 tons, a respective 74 and 75 percent reduction from 1993 to 1999. During 1999 our recycling programs allowed us to divert 4,275 tons of waste which would have otherwise been land disposed. Toxic Release Inventory (TRI) emissions have been reduced 99.33 percent. In 1988 the plant emitted 540,000 pounds of TRI chemicals. By 1996 TRI emissions were reduced to 3,635 pounds. Extensive Environmental Remediation efforts have addressed legacy contamination by removing over 95,000 tons of contaminated soils and pumping and treating over 120 million gallons of contaminated groundwater. Since 1997 38,000 pounds of ozone depleting substances have been eliminated by replacing / retrofitting chillers. Forty-nine USTs have been permanently removed reducing future environmental liability. Outstanding operation of our Industrial Wastewater Pretreatment Facility was recognized by the Water Environment Federation with the 1997 Global Industrial Pretreatment Award. All of the approximately 50 transformers that utilized PCB coolant have been replaced. Eleven hazardous waste storage lots (43,500 ft^2) were closed during the last two years as the KCP transitioned from RCRA Part B Interim Status to a 90-day generator facility with 5,000 ft^2 of waste storage.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check ***yes*** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI ☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Note: The KCP Management and Operating contractor, Honeywell FM&T, maintains the ISO 14001 certification for the facility. The Department of Energy's Kansas City Area Office (KCAO) performs contract administration and programmatic oversight of activities at the KCP.

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)? **1997**		What is the current level? **1999**	
	Quantity	Units	Quantity	Units
Emissions of NOx, SOx, VOCs, PM10 and CO.	**74.65**	**tons**	**64.86**	**tons**

i. How is the current level an improvement over the previous level?

9.79 fewer tons of NOx, SOx, VOCs, PM10 and CO are emitted resulting in a 13% decrease in emissions.

		Tons of:					
	Year	NOx	SOx	VOCs	PM10	CO	Total Tons
Baseline	1997	43.38	1.24	11.72	2.62	15.69	74.65
	1998	40.94	0.39	10.35	2.52	14.42	68.62
	1999	40.54	0.38	8.78	1.11	14.05	64.86

ii. How did you achieve this improvement?

We instituted process changes using low sulfur fuel in boilers, began using of low VOC paints in painting operations and substituted use of VOC based cleaners with aqueous cleaners. We also instituted manufacturing process changes and eliminated solvent use in most production operations that had, in the past, utilized VOCs.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)? **1997**		What is the current level? **1999**	
	Quantity	Units	Quantity	Units
Hazardous solid wastes (RCRA Wastes)	**247,680**	lbs.	**145,140**	lbs

i. How is the current level an improvement over the previous level?

The plant has reduced the quantity of routine hazardous waste by 102,540 pounds (41.4%) from CY1997 to CY 1999. During the baseline year of 1997, 247,680 lbs. of RCRA waste was generated. During 1998, 220,510 lbs. of RCRA waste was generated and during 1999, 145,140 lbs. of RCRA waste was generated.

ii. How did you achieve this improvement?

Process changes to

- Reduce wastewater flows to our Industrial Wastewater Pretreatment Facility and resultant sludge by;
  - eliminating non hazardous machine coolant waste stream,
  - redirecting one-pass cooling water directly to the sanitary sewer,
  - implementing in-line reconditioning of plating solutions, and
  - modifying plating processes.
- Switched cleaning processes for electronic components to employ aqueous based cleaning solutions.
- Replaced hazardous materials with alternative materials in the manufacture of foam materials.
- Worked with generators to reduce / eliminate the use of hazardous materials in processes.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Hazardous Solid Waste

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — **145,140 lbs** (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — **10,000 lb/yr reduction** (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

e. How will you achieve this improvement?

Process changes to:

- Substitute non-hazardous materials for hazardous materials.
- Point of generation waste segregation.
- Reduce generation of or reuse off-specification material.
- Reduce wastewater flows to our Industrial Wastewater Pretreatment Facility and resultant sludge by;
  - Redirecting one-pass cooling water directly to the sanitary sewer.
  - Modification of plating processes and resultant industrial wastewater.

Second aspect you've selected

a. What is the aspect?

Water Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value — **200,000 gpd of cooling tower make-up water** (Quantity/Units)

☐ Option B: In terms of units of production or output — (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value **20,000 gal/ day** (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Treated dilute industrial wastewater will be recycled for use as cooling tower make-up water. By recycling this water the plant will require at least 20,000 gallons per day less make-up water, while discharging approximately 20,000 gallons per day less treated industrial wastewater to the sanitary sewer.

Third aspect you've selected

a. What is the aspect?

Energy Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

Varies with production needs and weather conditions. 1999 use of gas/electrical energy = 1047.6 billion BTUs.

☐ Option B: In terms of units of production or output

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

Continue to manage energy usage in a downward trend in support of Executive Order 13123 and achieve a 1.3% per year energy use reduction.

☐ Option B: In terms of units of production or output

(Quantity/Units)

e. How will you achieve this improvement?

An Energy Management Plan will be published every December; the plan will identify a series of operational improvements that will reduce energy usage by improving operating efficiencies. The plan will also review, update and implement procedures which monitor and control energy usage throughout the facility. This will include the use of the direct digital control system to control environmental conditions and shutdown energy using equipment when not in use.

Fourth aspect you've selected

a. What is the aspect?	**Emission of NOx**	
b. Is this aspect identified as significant in your EMS?	☒ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	**1999 – 40.54 Tons** (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	**By 2003 reduce NO_x emissions by 15%**
	☐ Option B: In terms of units of production or output	(Quantity/Units) (Quantity/Units)
e. How will you achieve this improvement?	Four existing boilers will be replaced with four new low NO_x boilers that utilize fuel efficient burners which will reduce average NO_x emissions by 15%. The percent reduction achieved is based on historic use of natural gas and assumes that similar quantities of natural gas will be used in the new low NO_x boilers.	

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

We have procedures for addressing community concerns. Calls from the community are routed through the Public Affairs department, which in turn, forwards them to the appropriate department. As part of the community relations program, we publish a quarterly newsletter, called *Focus on the Environment*, which goes to plant neighbors and community leaders. We also include ES&H related articles in another newsletter, *Quest*, which is sent to retirees and various community leaders. *Focus on the Environment* includes a bi-annual survey that provides feedback from neighbors and community leaders about our programs and any concerns that they may have. We have an active media relations program that provides the community with positive environmental information and responds to concerns.

2 How do you inform community members of important matters that affect them?

We inform community members through *Focus on the Environment* and *Quest*. We issue press releases, as appropriate, on both positive happenings and areas of concern. We have a speakers bureau available to schools and other civic organizations. We provide answers to concerns through our Public Affairs department. We also communicate with our associates so that they can provide informed information to their neighbors and acquaintances. We maintain a reading room at a local library and we hold plant tours, when appropriate.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☒ Other

The summary and/or full report will be made available through *Focus on the Environment* and *Quest* (discussed above). Open houses at this facility are unlikely because of security issues associated with the plant's mission as Department of Energy facility.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Bridging the Gap	Stacia Stelk	(816) 561-1087
State/Local Regulator	Missouri Department of Natural Resources	Don Dicks	(573) 751-3553
Other community/local reference	City of Kansas City, MO	Denise R. Burkett	(816) 784-1006

Section E

Application and Participation Statement.

On behalf of the U.S. Department of Energy Kansas City Plant and Honeywell Federal Manufacturing and Technologies:

We certify that

- We have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- We have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- The facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- The facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), the facility is, to the best of our knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

We agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title: Elizabeth D. Sellers, Area Manager

Facility Name: U. S. Department of Energy Kansas City Plant

Signature/Date

Printed Name/Title: Karen K. Clegg, President

Facility Name: Honeywell Federal Manufacturing & Technologies

Facility Street Address: 2000 E. 95th Street
P.O. Box 410202
Kansas City, MO 64141-0202

Facility ID Numbers: EPA ID – MO9890010524

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name DOE Kansas City Plant (operated by Honeywell FM&T)
Facility Location: Kansas City, Missouri
Facility ID Number(s): EPA ID - MO9890010524
(attach additional sheets if necessary) MO Generator ID - 001144

Air Pollution Regulations	Check All That Apply
1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	☒
2. Permits and Registration of Air Pollution Sources	☒
3. General Emission Standards, Prohibitions and Restrictions	☒
4. Control of Incinerators	☐
5. Process Industry Emission Standards	☐
6. Control of Fuel Burning Equipment	☐
7. Control of VOCs	☒
8. Sampling, Testing and Reporting	☒
9. Visible Emissions Standards	☒
10. Control of Fugitive Dust	☐
11. Toxic Air Pollutants Control	☒
12. Vehicle Emissions Inspections and Testing	☐
Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)	
13. 10 CSR 10-2	☒
14. 10 CSR 10-6	☒

Hazardous Waste Management Regulations	
1. Identification and Listing of Hazardous Waste (40 CFR 261)	
- Characteristic Waste	☒
- Listed Waste	☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
- Manifesting	☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒

3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
   - Transfer facility requirements ☒
   - Manifest system and record-keeping ☒
   - Hazardous waste discharges ☐
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
   - General facility standards ☐
   - Preparedness and prevention ☐
   - Contingency plan and emergency procedures ☐
   - Manifest system, Record keeping and reporting ☐
   - Groundwater protection ☐
   - Financial requirements ☐
   - Use and management of containers ☐
   - Tanks ☐
   - Waste piles ☐
   - Land treatment ☐
   - Incinerators ☐
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
7. Administered Permit Program (Part B) (40 CFR 270) ☒

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. 10 CSR 25 ☒
9. ☐

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6. 11 CSR 40-4 ☒
7. ☐

Solid Waste Management

1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
2. Permit Requirements for Solid Waste Disposal Facilities ☐
3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☒
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. 10 CSR 80 ☒
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☒
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☒
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☒

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. 10 CSR 20-6 ☒
18. 10 CSR 20-7 ☒

Drinking Water Regulations

1. Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☒
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☒
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☒
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☒
3. Certification of Pesticide Applications (40 CFR 171) ☒
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. 2 CSR 70.25 ☒
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐

☐

2. RCRA Corrective Action (identify)
   See also item 7 under Hazardous Waste Management Regulations. The KCP maintains a RCRA Part B Post Closure Permit which regulates RCRA Corrective Action at the facility. ☒

☐

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3. 10 CSR 25 (Post Closure Permit) ☒
4. ☐